



ENZYMATIC THERAPY
INCORPORATED
*What **Better** feels like.™*

INTEGRATIVE THERAPEUTICS INC.™
NF Formulas + PhytoPharmica
Tyler Encapsulations + Vitaline Formulas

9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 + F: 503.582.0467

ENZYMATIC THERAPY™
&
PHYTOPHARMICA™

825 Challenger Drive, Green Bay, WI 54311-8328
P: 920.469.1313 + F: 888.570.6460 (Enzymatic)
P: 920.469.9099 + F: 920.469.4418 (Phyto)

October 19, 2004

10/19/04

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

PRODUCT NAME	STATEMENTS	DISCLAIMERS
Blue Heron™	Blue heron is a comprehensive, encapsulated, bulk fiber supplement.* This proprietary formula combines psyllium, demulcents, absorbents, and intestinal microflora with time-tested Ayurvedic herbs to provide patients with effective, yet gentle, intestinal support.*	Borage seed (Borago officinalis), Flax seed (Linum usitatissimum), Oat bran (Avena sativa), Psyllium husk (Plantago ovata), Bentonite clay, Plum fruit (Prunus domestica), Fenugreek seed (Trigonella foenum-graecum), Marshmallow root (Althaea officinalis), Slippery Elm bark (Ulmus rubra), Triphala (a blend of Amla fruit, Belleric Myrobalan fruit and Chebulic Myrobalan fruit), Spectra Probiotic proprietary blend- Lactobacillus acidophilus, Bifidobacterium bifidum, B. infantis, B. longum, L. bulgaricus, L. casei, L. salivarius, and Streptococcus thermophilus, Papain (Papaya enzyme)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 10/19/04

97S 0162 LET 14811

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael P. Devereux". The signature is fluid and cursive, with a large, stylized initial "M".

Michael P. Devereux
Chief Financial Officer



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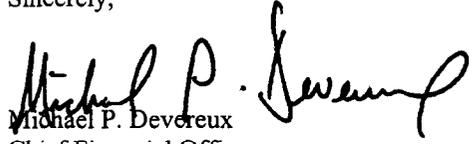
PRODUCT NAME	STATEMENTS	INGREDIENTS WHICH THE CLAIM REFERS
Blue Heron™	Dietary fiber supports normal gastrointestinal function and colon health.*	Borage seed (<i>Borago officinalis</i>), Flax seed (<i>Linum usitatissimum</i>), Oat bran (<i>Avena sativa</i>), Psyllium husk (<i>Plantago ovata</i>), Bentonite clay, Plum fruit (<i>Prunus domestica</i>), Fenugreek seed (<i>Trigonella foenum-graecum</i>), Marshmallow root (<i>Althaea officinalis</i>), Slippery Elm bark (<i>Ulmus rubra</i>), Triphala (a blend of Amla fruit, Belleric Myrobalan fruit and Chebulic Myrobalan fruit), Spectra Probiotic proprietary blend- <i>Lactobacillus acidophilus</i> , <i>Bifidobacterium bifidum</i> , <i>B. infantis</i> , <i>B. longum</i> , <i>L. bulgaricus</i> , <i>L. casei</i> , <i>L. salivarius</i> , and <i>Streptococcus thermophilus</i> , Papain (Papaya enzyme)

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Sincerely,


Michael P. Devereux
Chief Financial Officer